

AUG 22 2023

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS  
 CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NATHANIEL LUZ,

Defendant.

CRIMINAL NO. 23 CR 1295 KWRCount 1: 18 U.S.C. §§ 1153, 2241(c), and  
2246(2)(C): Aggravated Sexual Abuse;Counts 2-3: 18 U.S.C. §§ 1153, 2241(c),  
and 2246(2)(B): Aggravated Sexual  
Abuse;Count 4: 18 U.S.C. §§ 1153, 2241(c), and  
2246(2)(A): Aggravated Sexual Abuse;Count 5: 18 U.S.C. §§ 1153, 2243(a), and  
2246(2)(C): Sexual Abuse of a Minor;Counts 6-7: 18 U.S.C. §§ 1153,  
2244(a)(5), and 2246(3): Abusive Sexual  
Contact.

INDICTMENT

The Grand Jury charges:

Count 1

Between on or about December 6, 2014 and on or about December 5, 2015, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **NATHANIEL LUZ**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe 1, a child who had not then attained the age of 12 years, and the sexual act consisted of penetration, however slight, of the genital opening of Jane Doe 1 by a hand and finger and by any object of the defendant, with the intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2241(c), and 2246(2)(C).

Count 2

Between on or about December 6, 2018 and on or about December 5, 2020, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **NATHANIEL LUZ**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe 1, a child who had not then attained the age of 12 years, and the sexual act consisted of contact between the mouth of the Defendant and the vulva of Jane Doe.

In violation of 18 U.S.C. §§ 1153, 2241(c), and 2246(2)(B).

Count 3

Between on or about December 6, 2018 and on or about December 5, 2020, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **NATHANIEL LUZ**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe 1, a child who had not then attained the age of 12 years, and the sexual act consisted of contact between the mouth of Jane Doe and the penis of the Defendant.

In violation of 18 U.S.C. §§ 1153, 2241(c), and 2246(2)(B).

Count 4

Between on or about April 1, 2022 and on or about April 30, 2022, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **NATHANIEL LUZ**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe 1, a child who had not then attained the age of 12 years, and the sexual act consisted of contact between the penis and the vulva, involving penetration, however slight, of Jane Doe 1's vulva.

In violation of 18 U.S.C. §§ 1153, 2241(c), and 2246(2)(A).

Count 5

Between on or about August 1, 2022 and on or about August 31, 2022, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **NATHANIEL LUZ**, an

Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe 2, a child who had attained the age of 12 years, but had not attained the age of 16 years, and Jane Doe 2 is at least four years younger than the defendant, and the sexual act consisted of penetration, however slight, of the genital opening of Jane Doe 2 by a hand and finger and by any object of the defendant, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2243(a), and 2246(2)(C).

Count 6

Between on or about January 6, 2014 and April 30, 2022, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **NATHANIEL LUZ**, an Indian, unlawfully and knowingly engaged in and caused sexual contact with Jane Doe 1, a child who had not then attained the age of 12 years, and the sexual contact consisted of the intentional touching, directly and through the clothing, of the defendant's genitalia with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2244(a)(5) and 2246(3).

Count 7

Between on or about January 1, 2021, and on or about December 31, 2021, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **NATHANIEL LUZ**, an Indian, unlawfully and knowingly engaged in and caused sexual contact with Jane Doe 3, a child who had not then attained the age of 12 years, and the sexual contact consisted of the defendant intentionally touching Jane Doe 3's genitalia directly and through the clothing, with the intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2244(a)(5), and 2246(3).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney